

## NRC NFPA 805 Workshop

# LAR Efficiency and Cost-Saving Improvements

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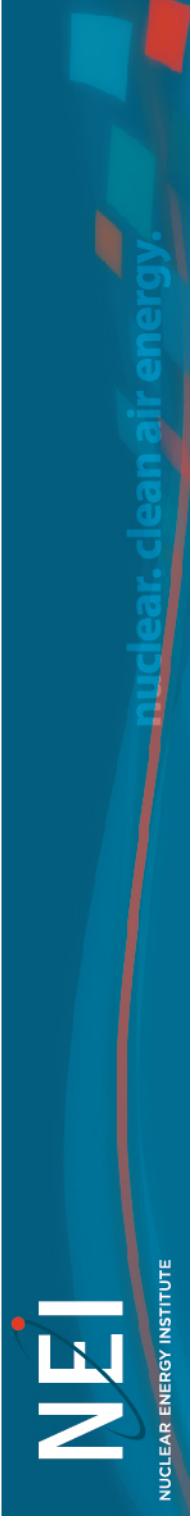
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# Agenda

- FPPRA Review
- LAR Audits/Portals
- Submittals/RAI Responses
- SE and License Conditions
- Recommendations



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# FPRRA Review

- Unpredictability in FPRRA licensing causes utilities to avoid NFPA 805
- Adding predictability will improve efficiency and more plants will transition
- Review efforts tend to focus on modeling methods rather than the processes used to refine FPRRA models
- FPRRA stability is needed in order for both the staff and licensees to establish a predictable schedule for completion of the later phases of the reviews

# FPRA Review - Ideas

- NRC lack of confidence in the RG 1.200 process for establishing PRA quality Focus NRC LAR review on FPRA Configuration control
  - Proposed Solution – [Refer to Fire PRA adequacy presentation.]
- Incorporation of evolving information
  - Proposed Solution - Utility submits evaluations based on:
    - Peer reviewed model that has been peer reviewed or
      - A peer reviewed fire PRA that has been updated three years prior to LAR submittal.
  - New modeling data/issues addressed through model and application updates (per standard)
  - Post-LAR inspections (triennials) ensure licensees meet requirements

# FPRRA Review - Ideas

- Advantages of Expediting FPRRA Licensing
  - FPRRA used for identifying modifications
  - Modification “churn” negatively impacts schedule and cost
- Safety improvement implementation delayed
- More plants would realize the overall safety benefits of NFPA 805
- Suggest a process similar to DC/COL-ISG-011, “Finalizing Licensing-basis Information” due to NRC familiarity



# LAR Audits/Portal

- LAR audits are most productive when a thorough review of the LAR has been performed
  - Staff may not have an opportunity to do so with current schedule
- Pre-LAR calls are useful, but have become more of a “template”
  - Industry willing to support specific phone conversations and smaller, focused teams
- Portal considered a good practice, but NRC cannot use info for SE
- Need for immediate notification of concerns or discrepancies
  - If the staff finds something licensee needs rapid notification to make changes to avoid delays

# Submittal/RAI

- 21 Plants in NRC queue
- LARs from 700-4000 pages
- RAI volume large, with multiple parts
  - ~ 2494 RAI “Questions”
    - PRA – 1205
    - Fire Modeling - 491
    - Fire Protection – 325
    - NSCA – 300
  - Radioactive Release – 67
  - Monitoring - 53
  - Programmatic – 50
  - None Specified - 3

# Submittal/RAI

- LAR template is a good practice
  - Refinement still beneficial
    - ✓ Fire modeling details, plus details on “generic” LARs
    - ✓ Optimize information in B-1, B-2, and B-3 Tables
  - RAIs and responses should be concise and focused on necessary information
    - Incorporate detail on “generic RAIs in LAR or on portal
    - Licensees should be disciplined in categorizing 60, 90, and 120-day RAIs
  - Answers to questions still need to be “Docketed”
    - RAIs with many subparts should be avoided
    - Feedback on RAI responses is necessary



# SE and License Conditions

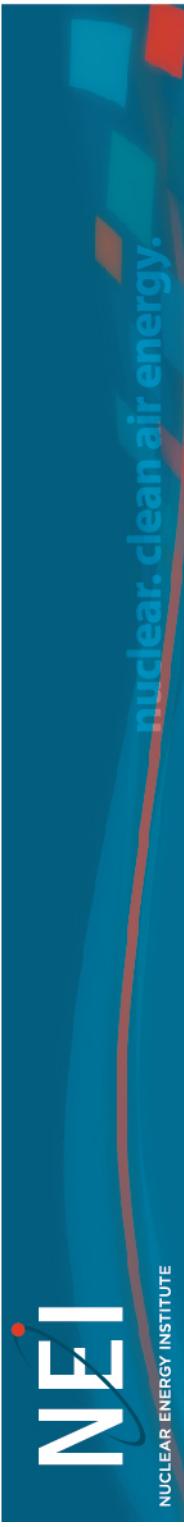
- Proposed metrics for licensing efficiency
  - Number of RAIs by topic
  - NRC Review hours & number of reviewers
  - Size and complexity of License Conditions
  - Milestones and elapsed review time
  - Contractor and internal hours
    - LAR development
    - RAI and audit response
  - Modification scope stability and cost

# Recommendations

- Maintain High Level of Consistency
  - Helps licensees and NRC in developing efficiencies
- Focus RAIs
  - Need to reflect appropriate regulatory processes and guidance
- Regularly scheduled phone calls with NRC staff reviewers
  - At working levels to assist staff and licensee



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# Recommendations (con't)

- NRC involvement with FPRRA Peer Review
- Licensee establishes “freeze point”
  - Licensee tracks OE and methodology changes using its own processes
  - Licensees’ processes also used to determine when an “immediate notification” to NRC of an FPRRA change is needed
    - Licensee has three options available to address “immediate notification”
      - Update the FPRRA and submit new results
      - Change mods or commitments, implement in FPRRA and submit new results.
      - Leave FPRRA as-is and commit to meeting submitted CDF, LERF, Δ-CDF, and Δ-LERF values (“performance goals”)
  - Substantial progress has been made, but more will help

